

**PATENT**  
**Application # 10/664,754**  
**Attorney Docket # 2002P15652US01 (1009-039)**

**REMARKS**

The Examiner is respectfully thanked for the consideration provided to this application. Reconsideration of this application is respectfully requested in light of the foregoing amendments and the following remarks.

Each of claims 1, 2, 4-7, 9, 19, and 20 has been amended for at least one reason unrelated to patentability, including at least one of: to address one or more informalities; to explicitly present one or more limitations, phrases, words, terms, and/or elements implicit in the claim as originally written when viewed in light of the specification, thereby not narrowing the scope of the claim; to detect infringement more easily; to enlarge the scope of infringement; to cover different kinds of infringement (direct, indirect, contributory, induced, and/or importation, etc.); to expedite the issuance of a claim of particular current licensing interest; to target the claim to a party currently interested in licensing certain embodiments; to enlarge the royalty base of the claim; to cover a particular product or person in the marketplace; and/or to target the claim to a particular industry.

Claims 1-20 are now pending in this application. Each of claims 1, 19, and 20 are in independent form.

**The Anticipation Rejections**

Each of claims 1-20 was rejected as anticipated under 35 U.S.C. 102(b). In support of the rejection, various portions of U.S. Patent No. 5,911,145 ("Arora") were applied. These rejections are respectfully traversed as moot in view of the present amendments to each of independent claims 1, 19, and 20.

Each of independent claims 1, 19, and 20, from one of which each of claims 2-18 depend, states, *inter alia*, yet the applied portions of Arora do not teach, "obtaining an organization and a hierarchy of a collection comprising a plurality of human machine interface (HMI) screen nodes, each of the plurality of HMI screen nodes a visual representation of a corresponding visual display of a human machine interface adapted to interpret communications from a human operator of an industrial plant to an automated machine controller".

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Each of independent claims 1, 19, and 20, from one of which each of claims 2-18 depend, states, *inter alia*, yet the applied portions of Arora do not teach, "responsive to a detected collision between a parent node of said hierarchy of said collection and a leaf node of the parent node, automatically adjusting a position of said parent node".

For at least these reasons, Applicant respectfully requests a reconsideration and withdrawal of each rejection of each of claims 1-20.

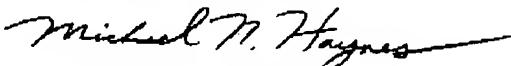
**CONCLUSION**

It is respectfully submitted that, in view of the foregoing amendments and remarks, the application as amended is in clear condition for allowance. Reconsideration, withdrawal of all grounds of rejection, and issuance of a Notice of Allowance are earnestly solicited.

The Office is hereby authorized to charge any additional fees or credit any overpayments under 37 C.F.R. 1.16 or 1.17 to Deposit Account No. 50-2504. The Examiner is invited to contact the undersigned at 434-972-9988 to discuss any matter regarding this application.

Respectfully submitted,

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